

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

QUILVEST FINANCE LTD.,

Defendant.

Adv. Pro. No. 11-02538 (CGM)

STIPULATION AND ORDER

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll, and the chapter 7 estate of Bernard L. Madoff, and defendant Quilvest Finance, Ltd. (now known as QS Finance Ltd.) (“Defendant,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, on August 18, 2011, the Trustee commenced adversary proceeding number 11-02538 (the “Action”) against Defendant to, among other things, recover transfers allegedly received from Fairfield Sentry Limited, and from others, pursuant to 11 U.S.C. § 550.

IT IS HEREBY STIPULATED AND AGREED, that the deadline for the Defendant to respond to the Complaint in the Action shall be March 4, 2022. If Defendant files a motion to dismiss the Complaint, such motion shall set forth any and all grounds for dismissal at the pleading stage, in accordance with Rule 12 of the Federal Rules of Civil Procedure. The deadline for the Trustee to respond to the motion shall be May 4, 2022, and the deadline for the Defendant to file a reply shall be June 3, 2022.

IT IS HEREBY STIPULATED AND AGREED, that if Defendant files a motion to dismiss the Complaint, then the parties shall request oral argument on the motion at the Court’s first available convenience. The deadlines established by this Stipulation and Order are without prejudice to either Party seeking future extensions of time.

IT IS HEREBY STIPULATED AND AGREED, that the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Dated: January 19, 2022
New York, New York

By: /s/ Robertson D. Beckerlegge
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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

SO ORDERED.

By: /s/ Thomas E. Lynch
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*Attorneys for Quilvest Finance Ltd. (now
known as QS Finance Ltd.)*

Dated: January 20, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge